

To: Seyfried, Erin[Seyfried.Erin@epa.gov]
Cc: Stoddard, Jamey[Stoddard.Jamey@epa.gov]; Shaw, Hanh[Shaw.Hanh@epa.gov]
From: Cool, Richard
Sent: Thur 2/7/2013 5:40:18 PM
Subject: Re: Fw: Call with Heather Ptak (Shell)

DELIBERATIVE PROCESS

We might not be able to answer her questions in this meeting without some further information from her and some follow-up internal deliberations and OK from management. Here is my first swing at some factors I think are relevant to the discussion:

Issue 1

The GPs do not contain a "substantially identical outfall" offramp like the MSGP that could have been used for possible composite sample of distinct outfalls. Accordingly, my initial interpretation is that the GP requires sampling of each outfall four (4) times a well.

I think Heather's question about the rapid automated tox (RAT) test might be too broad in regard to 002-deck drainage: see Chukchi GP, Part II.C.3. and Table 3. WET testing for 002 has to occur from the OWS discharge and its my recollection that both Kulluk and Disco have one OWS so four times a well should not be an issue. "Clean" deck drainage can be discharged if it meets the no-contamination determination need to trigger OWS treatment and the visual screen for "no free oil" in Table 3 - I don't think Part II.C. is written to require the RAT test of "clean" deck drainage.

I also suspect Heather's main concern about multiple discharge points is the 009-NCCW . . . but we can ask her to explain further in an effort to narrow the discussion. My concern is that our discussion unless specific to a named discharge might inadvertently go too far in any compromise position we might consider. One concern with composite sampling of discharges with multiple discharge points (e.g. 009) would be the inability to retrace the source of toxicity if the RAT test hits a positive reaction.

As noted, my initial reaction to composite sampling is not favorable because the GPs lack the substantially identical offramp option. I realize we are only in the opening discussion stage but I am suspicious that Shell will have a "hardship" or technical impossibility

argument. Obviously Heather is pushing to see what flexibility we have but I think we need some demonstration of why separate RAT tests are not possible if we are to entertain composite sampling. The general theme about RAT test was emphasis on an on-site "rapid" test so I think we need to hear more about their intended RAT method to see if the test itself creates an impossibility problem.

Chemical Additives. One operating criteria in regard to any potential to allow composite sampling . . . no composite sampling of any discharge that has chemical additives . . . this might not be an issue because I think Shell wants to be additive free for NCCW but we should make sure this factor is discussed. I think this is an important operating parameter because I suspect chemical addition (rates, volumes, types, etc.) might not be exactly the same for each separate 009 discharge.

Substantially Identical Outfalls. If we entertain composite sampling, I think the permittee would have burden to demonstrate data showing that composited waste streams are similar or identical. Part of that evaluation/demonstration might be to show similar industrial processes.

For example, Shell's Disco has six separate 009-NCCW outfalls:

- A-cat engine/generators
- B - SCR room A/C unit
- C- compressor/hydraulic units
- D-House A/C Fridge
- E- Halliburton cement
- F-evaporator unit

Maybe B and D are same or similar but the others? And the Haiburton cement NCCW is probably a periodic discharge because they are not cementing continuously. If we entertain composite sampling, maybe the EMP needs to contain the demonstration of same/similar and we can make final decisions then but we should think about various factors we would want addressed in such demonstration.

Issue 2 - 4/times testing for discharges that are only released once per well? First, let's get a sense of how "rapid" is their RAT test. Second, over what period of time does her boiler blowdown

discharge occur?

The 4/times-per-well should not promote more discharges than are necessary in the routine course of operations but I think permittees will be hard pressed to demonstrate impossibility to get 4 samples if the time period of discharge allows reliable, safe and timely testing using the chosen RAT test method.

Let me know if we need to discuss more on these two issues before the meeting. Later.

Rick

From: Erin Seyfried/R10/USEPA/US
To: Richard Cool/R10/USEPA/US@EPA,
Cc: Jamey Stoddard/R10/USEPA/US@EPA
Date: 02/06/2013 03:08 PM
Subject: Re: Fw: Call with Heather Ptak (Shell)

Hello -

Heather just called and asked the following two questions with respect to the initial toxicity screening requirements:

1) For discharges with greater than 1 discharge point (ex. non-contact cooling water and deck drainage at around 7 - 9 discharge points), is the Permittee to sample each discharge point 4 times per well? Or 4 composite samples of all discharge points per discharge per well?

---EES Draft Opinion: I am not opposed to a composite sample across the 7 - 9 discharge points per discharge category...but I think this could use further discussion.

2) What about discharges that are only released once per well (i.e. boiler blowdown)? Does the "4 times per well" requirement still stand? Do they need to discharge more frequently to meet that requirement?

---EES Draft Opinion: I think that they could sample 4 times over the period of the one discharge event; or sample just the once with notes that this is not a continuous or frequent discharge.

I think these questions are aimed more towards Rick and myself, but Jamey, if you have any thoughts, feel free to weigh in. I did not share any of my opinions with Heather, would rather wait until Monday.

Thank you,
Erin

From: Richard Cool/R10/USEPA/US
To: Heather.Ptak@shell.com
Cc: Erin Seyfried/R10/USEPA/US@EPA, Jamey Stoddard/R10/USEPA/US@EPA
Date: 02/06/2013 02:05 PM
Subject: Fw: Call with Heather Ptak (Shell)

Hi Heather:

In one of our December discussions, you posed the question of whether the WET holding times apply to both initial and renewal samples. We will be prepared to discuss that issue on Monday and Jamey will be able to attend at the beginning of the Monday call to discuss any other WET questions you might have pending.

If you have other WET questions and your time permits, please forward them to the three of us if you can before the meeting which might give us time to review and be prepared to respond.

Thanks.

Rick

----- Forwarded by Richard Cool/R10/USEPA/US on 02/06/2013 02:01 PM -----

Call with Heather Ptak (Shell)

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Richard Cool

Chair: Erin Seyfried/R10/USEPA/US

Location: Mining Room

Richard Cool/R10/USEPA/US@EPA
Optional: Jamey Stoddard/R10/USEPA/US@EPA

